

# MEMO ENDORSED

TRULINCS 08283068 - MARLEY, JASON - Unit: BRO-I-C

FROM: 08283068  
TO:  
SUBJECT:  
DATE: 07/03/2018 07:55:07 PM

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
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DATE FILED: 7/23/18

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

JASON MARLEY

EX PARTE COMMUNICATION

CASE NO: 16 CR - 374 (VEC )

COMES NOW, Jason Marley, moving pro se, to be heard on or around July, 2018 or as soon as can be heard, at the Southern District Court, Which address is 500 pearl st. New York Ny 1007 in room for an Order seeking relief from trial counsel, Mr. Konoski for the Motion seeking relief

Relief and ground's sought are fully incorporated in the Attach a motion seeking relief from trial counsel of record, Brian konoski

Dated this 3 day of July, 2018

Defendant's motion is denied. Counsel is ordered to inform Defendant, as discussed previously, that Defendant may proceed pro se or with his current counsel, but the Court will not appoint new counsel. The Sentencing set for July 30, 2018 shall proceed as scheduled.

SO ORDERED.



7/23/18

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE

TRULINCS 08283068 - MARLEY, JASON - Unit: BRO-I-C

FROM: 08283068  
TO:  
SUBJECT: JUDGE  
DATE: 07/03/2018 07:54:15 PM

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK  
-----X

UNITED STATES OF AMERICA

EX Parte Communications

v.  
JASON MARLEY ,  
-----X

Case no : 16 Cr 374 : vec

### MOTION SEEKING RELIEF FROM TRIAL COUNSEL OF RECORD

Jason Marley and counsel of Record , Brian Knoski has a conflict between each other that is so great , it resulted in a total lack of communication of counsel's part preventing an adequate defense which substantially contributed to the breakdown in communication .

### RELIEF SOUGHT

Jason Marley Move the court for an order that's will :

1. remove counsel of record off the case and replace him with a competent lawyer of sound mind for his Mr. Marley in hereafter
2. leave counsel of record with the agreement of the cancellation of the STERN files ; order the production of the telephone records ; arguing the locational information in those stern files , including the dates, time telephone number used and the contradictions presented , or
3. Have newly given counsel do same and not be limited to the newly discovered evidence sought out and found by Mr. Marley

### GROUND FOR RELIEF

4 Mr. Marley 's motion should be granted relief from counsel because (a) counsel neglected to " pick up essential discovery Material ( in the form of telephone records ; and not limited to the stern files ) that formed the core of the governments prosecution and were made available to counsel from the government for some time/ (b) neglect a motion for not to discuss defense or trial strategy with Mr. Marley ; and (c) overall , failed to file the above claim's in Acquittal and Motion for New trial .

### SUPPORTING MATERIALS

All factual matter's on Which this motion is based set out in the record and the Newly discovered Evidence . Evidence that show's that the Government Misrepresented testimony as ' flatly contradicted ' by the Stern file and discovered Evidence . The STERN file Defense counsel told Marley , and the court he went into Agreement witho Mr. Marley knowledge and the Proof of his this is the contract with him and the Government .

Mr. Marley has the newly discovered evidence that would support a motion pursuant to frank V. Delaware , 57 I. EC 2d 667 ( 1978) Napue v.illinois 360 u.s 264 , 271, 79, s.ct 1173 , 3 LEd. 2d 1217 (1956) and U.S. v. berger to suppress the false Statements or the Government's witnesses and to preserve the issue for Direct Appeal .

THERE FORE , it is in the best interest of the court , to relieve Brian Konoski , or in the alternative , order him to

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adhere to the facts he misapplied to the case in the filing of a Rule 29 and Rule 33 motion .

Dated : July 3, 2018

Respectfully submitted ,  
Jason Marley

A handwritten signature in black ink that reads "JASON MARLEY". The signature is written in a cursive, slightly stylized font. The word "JASON" is on the left and "MARLEY" is on the right, with a long horizontal stroke extending from the end of "MARLEY" that loops back under the word.

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FROM: 08283068

TO:

SUBJECT:

DATE: 07/03/2018 07:46:24 PM

Certificate of service

I, Jason Marley, certify that a true and correct copy of the attached notice of motion seeking relief from trial counsel of record, with Motion seeking relief from trial counsel of record, together was mailed in the United States Mail in a properly addressed envelope, with first class postage duly paid and affixed to the envelope, and with the envelope addressed to:

Brian Konoski

I declare under penalty of perjury that all the statements made in this certificate of service are true and correct and that if called to testify as witness in this matter, I could and would competently testify to each of the facts set forth in the certificate.

Dated this 3, day of July 2018

Respectfully submitted, Jason Marley

A handwritten signature in black ink that reads "JASON MARLEY". The signature is written in a cursive, stylized font. The first name "JASON" is written in all caps, and the last name "MARLEY" is also in all caps. There is a horizontal line drawn through the middle of the signature.